

PERRY, VAN ETTEN,  
ROZANSKI & KUTNER, LLP

PLEASE REPLY TO:

NEW YORK OFFICE  
14 Wall Street, Suite 4D  
New York, New York 10005  
(212) 406-9710  
Fax (646) 370-3303

Jeffrey K. Van Etten  
Member of the Firm  
[jkvanetten@pvrklaw.com](mailto:jkvanetten@pvrklaw.com)  
Extension 132

LONG ISLAND OFFICE  
225 Broadhollow Road, Suite 430  
Melville, New York 11747  
(631) 414-7930  
Fax (631) 777-4504

Members of the Firm

Douglas P. Perry  
Jeffrey K. Van Etten\*  
Kenneth J. Kutner\*\*

Partners

Leonard Porcelli\*\*  
Jerome S. Oliner\*  
Geoffrey H. Pforr  
Thomas F. Maher  
Joseph K. Strang  
Kevin J. Brennan

Senior Trial Counsel

Michael C. Dombrowski

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
Courtroom 443  
New York, NY 10007

February 8, 2022

**MEMO ENDORSED**

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Associates

John J. Ullrich  
Ariana K. Politis  
Kristen Petersen Hofer  
Anthony Lugara  
Jessica J. Beauvais  
Patrick F. Downey

Of Counsel

Thaddeus J. Rozanski  
Elizabeth G. Kastner  
Justine L. Grisanti-Van Etten\*  
Amanda L. Perry\*\*\*

Also Admitted in  
New Jersey\*  
Connecticut\*\*  
South Carolina\*\*\*

Re: Gergely Csikos v. S.M. Construction & Contracting Incorporated and  
230 Park South Apartments, Inc.//230 Park South Apartments, Inc. v.  
Remodel Art Corp. and Alin Florin Vadanuta//230 Park South Apartments, Inc.  
v. IR Holdings, LLC, Parkview Developers, LLC and Ian Reisner  
Our File No.: 129010  
**Docket No.: 18-cv-9598 (VEC)**

Dear Honorable Madam:

Please allow this correspondence to serve as defendant 230 Park South Apartments, Inc.'s application for an extension of time for both the filing of motions in limine applicable to plaintiffs experts, as well as responding to the motions in limine/preclusion submitted by plaintiff in the above-referenced matter. This is the initial application for an extension by defendant.

Defendant's extension is based on the fact that the undersigned is currently lead counsel in the tragic, January 9, 2022 Bronx fire, resulting in 17 fatalities. Since the day after this fire, I have been actively engaged in defense activities, encompassing not only multiple site visits (including a further full-fledged preliminary site inspection, with over 60 people scheduled for February 10, 2022 - plaintiff, interested parties and experts alike), but has also required active engagement in extensive evidence preservation, as well as necessary defense follow ups pertaining to the initially commenced litigations, future, anticipated litigations involving potentially over 100 litigants and compliance with and responses to City, State and Federal governmental inquiries. In view of this engagement, I have been unable to fully address the issues relevant to the future trial and the pre-trial in limine activities. Furthermore, the associate who with whom I had worked on this case prior to the January 9, 2022 fire, left my firm on December 23, 2021 and as such, there is no attorney in this office who has been engaged in the litigation, other than the undersigned as lead trial attorney, and my former associate.

With the Court's permission, we ask for a two (2) week extension on the deadlines for the motions in limine and replies to plaintiff's motion, and if possible, a one (1) week extension on the pre-trial order directives.

I thank the Court, in advance, for its anticipated assistance.

Very truly yours,

PERRY, VAN ETTEN, ROZANSKI  
& KUTNER, LLP

BY: Jeffrey K. Van Etten  
JEFFREY K. VAN ETTEN

JVE/mkr

cc: ***Via ECF & E-mail (Hostrovronai@ronaifirm.com)***

Ronai & Ronai, LLP  
The Ronai Building  
34 Adeo Street  
Port Chester, NY 10573  
Attn: Holly Ostrov Ronai, Esq.

***Via ECF & E-mail (VAvery@fordharrison.com)***

Ford Harrison, LLP  
60 East 42<sup>nd</sup> Street – 51<sup>st</sup> Floor  
New York, NY 10165  
Attn: Vincent M. Avery, Esq.

**Via ECF & E-mail ([kdanielsen@kdvlaw.com](mailto:kdanielsen@kdvlaw.com))**

Kaufman Dolowich Voluck LLP  
25 Main Street, Suite 500  
Hackensack, NJ 07601  
Attn: Kenneth B. Danielsen, Esq.

Application GRANTED. The parties' motions *in limine* are due by **March 11, 2022**. Responses are due by **March 18, 2022**.

The parties must submit a joint pretrial order, *see* Rule 8.A of the Undersigned's Individual Practices in Civil Cases, requested voir dire questions, and a joint request to charge by **April 8, 2022**.

SO ORDERED.



2/8/2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE